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Attorneys for Defendant

GOOGLE LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

ANIBAL RODRIGUEZ, et al. individually and  
on behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**DECLARATION OF EDUARDO E.  
SANTACANA IN SUPPORT OF  
DEFENDANT GOOGLE LLC'S  
OPPOSITION TO PLAINTIFFS' MOTION  
FOR LEAVE TO FILE FOURTH AMENDED  
COMPLAINT**

Judge: Hon. Richard Seeborg

Date: December 8, 2022

Time: 1:30 p.m.

Place: Courtroom 3 - 17th Floor

Trial Date: Not Yet Set

1 I, Eduardo E. Santacana, declare as follows:

2 1. I am an attorney licensed to practice law in the State of California. I am a partner  
3 with the law firm of Willkie Farr & Gallagher LLP, counsel of record for Google LLC (“Google”)  
4 in the above-captioned matter. Unless otherwise stated, the facts I set forth in this declaration are  
5 based on my personal knowledge. If called to testify as a witness, I could and would testify  
6 competently to such facts under oath.

7 2. I submit this declaration in support of Google’s Opposition to Plaintiffs’ Motion for  
8 Leave to File Fourth Amended Complaint.

9 3. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the  
10 transcript of the deposition of Christopher Ruemmler taken in the above-captioned action on  
11 September 9, 2022.

12 4. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the  
13 transcript of the deposition of David Monsees taken in the above-captioned action on September  
14 15, 2022.

15 5. Attached hereto as **Exhibit 3** is a true and correct copy of Google’s Privacy Policy  
16 effective as of October 4, 2022, which has been produced in the above-captioned action at  
17 Beginning Bates number GOOG-RDGZ2-00000313.

18 6. Attached hereto as **Exhibit 4** is a true and correct copy of a Google web page titled  
19 “How Google Retains Data We Collect,” which was downloaded on November 12, 2022 at  
20 <https://policies.google.com/technologies/retention>.

21 7. Attached hereto as **Exhibit 5** is a true and correct copy of a Google web page titled  
22 “How Google Anonymizes Data,” which was downloaded on November 12, 2022 at  
23 <https://policies.google.com/technologies/anonymization>.

24 8. Attached hereto as **Exhibit 6** is a true and correct copy of a Google Account  
25 “Activity controls” web pop-up page titled “Pause Web & App Activity” that was accessed on  
26 November 13, 2022 by selecting “Turn off” under the “Web & App Activity” heading on a  
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1 Google Account page available at <https://myactivity.google.com/activitycontrols?settings=search>  
2 [&utm\\_source=my-activity&facs=1](https://myactivity.google.com/activitycontrols?settings=search&utm_source=my-activity&facs=1).

3 9. Attached hereto as **Exhibit 7** is a true and correct copy of a Google web page titled  
4 “How Google Helps You Delete Data From Your Account,” which was downloaded on November  
5 12, 2022 at [https://support.google.com/accounts/answer/10549751#zippy=%2Chow-deletion-of-](https://support.google.com/accounts/answer/10549751#zippy=%2Chow-deletion-of-activity-works)  
6 [activity-works](https://support.google.com/accounts/answer/10549751#zippy=%2Chow-deletion-of-activity-works).

7 10. Attached hereto as **Exhibit 8** is a true and correct copy of a Google web page titled  
8 “Google Terms of Service – Privacy & Terms,” which was downloaded on November 12, 2022 at  
9 <https://policies.google.com/terms?hl=en-US>.

10 I declare under penalty of perjury that the foregoing is true and accurate. Executed on  
11 November 14, 2022 in San Francisco, CA.

12  
13 /s/ Eduardo E. Santacana  
14 Eduardo E. Santacana  
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